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September 16, 2025

**VIA ELECTRONIC FILING**

The Honorable Leonard P. Stark  
United States District Court for the District of Delaware  
J. Caleb Boggs Federal Building  
844 North King Street  
Wilmington, DE 19801-3570

Re: *Crystallex International Corp. v. Bolivarian Republic of Venezuela*,  
D. Del. C.A. No. 1:17-mc-00151-LPS

Dear Judge Stark:

Pursuant to the Court's request at the conclusion of the Sale Hearing session on September 16, 2025, the Special Master submits this joint status report (this "**Joint Status Report**") on behalf of Special Master Robert B. Pincus (the "**Special Master**") in the above-referenced matter regarding the parties in interest's positions on the Special Master's request in the *Special Master's Updated Final Recommendation* (D.I. 2123), dated August 29, 2025, (the "**Updated Final Recommendation**") seeking the Court's authority to terminate that certain Stock Purchase Agreement, dated June 25, 2025, by and between Dalinar and the Special Master (D.I. 1837, Ex. B) (the "**Dalinar SPA**"), in order to execute the proposed stock purchase agreement (the "**Amber SPA**") attached to the Updated Final Recommendation as Exhibit B. See D.I. 2123 at 2, 3. The Special Master sought the parties' positions by 9:00 P.M. ET this evening by email. The parties' positions are set forth below:<sup>1</sup>

- The following parties consent to the Special Master's request: (i) Crystallex; (ii) ConocoPhillips; (iii) OI European Group Limited; (iv) Huntington Ingalls Incorporated; (v) ACL1 Investments Ltd., ACL2 Investments Ltd., and LDO (Cayman) XVIII Ltd.; (vi) Red Tree; (vii) Gramercy Distress Opportunity Fund LLC, G&A Strategic Investments I LLC, G&A Strategic Investments II LLC, G&A Strategic Investments III

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master's Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the "**Sale Procedures Order**") or the Updated Final Recommendation.

LLC, G&A Strategic Investments IV LLC, G&A Strategic Investments V LLC, G&A Strategic Investments VI LLC, G&A Strategic, Investments VII LLC, Girard Street Investment Holdings LLC, Tenaris S.A., and Talta-Trading, e Marketing Sociedade Unipessoal Lda; (viii) Amber; and (ix) the PDVSA 2020 Bondholders.

- The following parties express no position on the Special Master's request: (i) Rusoro; (ii) Koch; and (iii) Tidewater.
- The following parties object to the Special Master's request: (i) the Venezuela Parties; (ii) Gold Reserve; (iii) Siemens; and (iv) Valores.
- The following parties did not respond to the Special Master's email requesting a position for inclusion in this Joint Status Report: (i) Contrarian Capital Management L.L.C.; and (ii) Saint-Gobain Performance Plastics Europe.

The parties will be prepared to address any of your Honor's queries on this issue at the Court's convenience.

Respectfully submitted,

*/s/ Myron T. Steele*

Myron T. Steele

On Behalf of Robert B. Pincus, Special Master for  
the United States District Court for the District of  
Delaware

cc: Counsel of Record (via CM/ECF)